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November 8, 2024

Via ECF

The Honorable Katherine Polk Failla
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *Genius Group Limited v. LZG International, Inc., et al.* (No. 1:24-cv-08464);
Petitioner's Request to Provisionally File Document Under Seal

Dear Judge Failla:

We represent Petitioner Genius Group Limited ("Petitioner") in the above-referenced action. Pursuant to Rules 9(B) and 9(C)(i) of the Court's Individual Rules of Practice in Civil Cases, we write to respectfully request permission to provisionally file under seal Exhibit 9 to the Affirmation of Christopher M. Basile in Support of Petitioner's Petition for Temporary Restraining Order and Preliminary Injunction in Aid of Arbitration ("Affirmation").

There is a current arbitration between Petitioner and Respondents LZG International, Inc., Michael Thomas Moe, and Peter Ritz in the International Court of Arbitration of the International Chamber of Commerce captioned *Genius Group Limited v. LZG International, Inc., et al.* (Case No. 29043) (the "Arbitration"), and one of the exhibits annexed to the Affirmation (Exhibit 9) contains Claimant's Statement of Claim, which has been filed in the Arbitration. Petitioner respectfully submits that the confidentiality of the Arbitration warrants the filing of Exhibit 9 to the Affirmation under seal.

As such, Petitioner respectfully requests that the Court provisionally permit the under-seal filing of Exhibit 9 to the Affirmation.

Dated: November 8, 2024

Respectfully submitted,

/s/ Christopher M. Basile

Christopher M. Basile
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Application GRANTED. The Clerk of Court is directed to maintain docket entry 9 under seal, viewable to the Court and the parties only.

The Clerk of Court is further directed to terminate the pending motion at docket entry 8.

Dated: November 8, 2024
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE